# **@ BELLSOUTH**

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March 25, 2003

The Honorable Gary E. Walsh Executive Director Public Service Commission of SC Post Office Drawer 11649 Columbia, South Carolina 29211

Re: Application of BellSouth Telecommunications, Inc. to Provide In-Region

InterLATA Services Pursuant to Section 271 of the Telecommunications

Act of 1996 (Six-Month Performance)

Docket No. 2001-209-C

Dear Mr. Walsh:

Enclosed please find for filing an original and fifteen copies of a Motion by BellSouth Telecommunications Inc. for a Paper Proceeding in the above-captioned matter. By copy of this letter, I am serving all parties of record with a copy of this document as indicated on the attached Certificate of Service.

Sincerely,

Patrick W. Turner

PWT/nml

Enclosure

PC Doc # 485232

# BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA DOCKET NO. 2001-209-C

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Application of BellSouth Telecommunications, Inc.
To Provide In-Region InterLATA Services
Pursuant to Section 271 of the Telecommunications
Act of 1996 - Six-Month Review

# MOTION BY BELLSOUTH TELECOMMUNICATIONS INC. FOR A PAPER PROCEEDING.

BellSouth Telecommunications, Inc. ("BellSouth") respectfully requests the Public Service Commission of South Carolina ("Commission) to cancel the hearing in this docket and render a decision on the basis of the paper record as it currently exists.

The grounds for this request are that on March 5, 2003, BellSouth pre-filed the direct testimony and exhibits of its witnesses in accordance with the Order Establishing Pre-Filing Deadlines ("Order") that was entered in this docket. On March 19, 2003, the Commission Staff pre-filed the direct testimony and exhibits of its witnesses in accordance with the Order. No other person or entity has pre-filed testimony or exhibits in this docket. The Order allows BellSouth to pre-file rebuttal testimony and exhibits on or before March 26, 2003, and it allows the Commission Staff and/or other parties to address any such rebuttal by pre-filing surrebuttal testimony and exhibits on or before March 28, 2003. BellSouth will not be filing any rebuttal testimony or exhibits, which means that no surrebuttal testimony or exhibits will be pre-filed.

Unless any other party to this docket objects, therefore, BellSouth requests that the Commission cancel the hearing in this docket, allow the parties to submit briefs on

the basis of the record as it currently exists, and render its decision on the basis of this record. Because the sheer number of parties of record made it impractical for BellSouth to contact each party individually to determine whether they objection to this approach, BellSouth requests that any party that objects to this approach file a copy of such objection and serve it upon all parties of record as soon as possible.

This 25th day of March, 2003.

Respectfully submitted,

Patrick W. Turner

1600 Williams Street, Suite 5200 Columbia, South Carolina 29201

J. Phillip Carver 675 West Peachtree Street, Suite 4300 Atlanta, Georgia 30375

ATTORNEYS FOR BELLSOUTH TELECOMMUNICATIONS, INC.

PC Docs # 485187

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

) CERTIFICATE OF SERVICE,

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth, Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth Telecommunications, Inc.'s Motion For a Paper Proceeding in Docket No. 2001-209-C to be served upon the following this March 25, 2003:

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PC Docs # 401224